



PUBLIC WORKS & ENGINEERING DEPARTMENT

Landfill Services Sanitation Services Street & Stormwater Services
Support Services Water & Wastewater Services Water Quality Services

725 Universal Street, Alcoa, Tennessee 37701

Office: (865) 380-4800 Fax: (865) 380-4803

Advanced Copy Via E-Mail

October 18, 2013

Ms. Souraya Fathi
Division of Water Resources
Tennessee Department of Environment & Conservation
William R. Snodgrass – Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

Re: Draft State Operating Permit No. SOP-88073
Alcoa Utilities Collection System Alcoa, Blount County, Tennessee

Dear Ms. Fathi:

As discussed this afternoon, we have reviewed the referenced draft permit and request several modifications that are noted below. These same requests were discussed with Mr. Woody Smith, Knoxville Environmental Field Office (KEFO), prior to my telephone call to you.

The requested revisions:

Page 2, 2nd Paragraph

As drafted the permit requires supervision of a Grade I Collection System Operator. A Grade II Operator is required since our system exceeds 5,000 customers.

Page 2, 4th Paragraph

The proposed permit requires that daily flow data at the points of discharge from the Alcoa system into the Maryville system be included in quarterly reports submitted to the KEFO. The Alcoa and Maryville systems are so intermingled that the separation and metering of the flows between the two systems is impractical. In addition, our current practice is to submit reports to the KEFO on a monthly basis. Therefore, we request that this paragraph be deleted in its entirety and the following paragraph (changes underlined to reflect current TDEC organization and to correct wording) from our current permit (copy enclosed) be inserted.

"The Alcoa collection system is intermingled with Maryville's, and thus, accurate measurement of the segregated flows is impossible. Instead, meter water sales to sewer customers can be reported. This information shall be included with MOR to the Division of Water Resources, Knoxville Environmental Field Office, 3711 Middlebrook Pike, Knoxville, TN 37921. Submittals shall be postmarked no later than 21 days after the completion of the reporting period."

Page 5, "b. Scheduled Reporting", 1st Paragraph

Change "Quarterly Report" to "Monthly Report".

EXCELLENCE IN SERVICE - QUALITY OF LIFE

www.cityofalcoa-tn.gov
publicworks@cityofalcoa-tn.gov

Ms. Souraya Fathi
Page 2
October 18, 2013

Page 8, Section G, INTER-JURISDICTIONAL AGREEMENT PROGRAM

As discussed this afternoon, the Maryville Regional Wastewater Treatment Plant (RWWTP) is co-owned by the City of Maryville and the City of Alcoa with the City of Maryville acting as operator of the RWWTP. The proposed Section G (which isn't included in our current permit) isn't applicable to the operations of the RWWTP or the cities' wastewater collection systems. If it is necessary to include a section to address this arrangement, please consider the following language (feel free to edit as you see fit):

G. OPERATION OF THE REGIONAL WASTEWATER TREATMENT PLANT

The Maryville Regional Wastewater Treatment Plant and the regional interceptor sewer system are facilities co-owned by the City of Maryville and the City of Alcoa. Operation of these facilities is governed by an Interlocal Agreement between the two cities with the City of Maryville designated as the operator of the same. This agreement or subsequent revisions shall remain in effect for the duration of Alcoa's permit. Copies of MOR's submitted to the Division of Water Resources, Knoxville Environmental Field Office shall be forwarded to the City of Maryville.

A copy of the original 1972 Agreement between the two cities is enclosed. Also enclosed is the most recent biennial letter agreeing to the allocation of the RWWTP's operating costs.

I appreciate your consideration of these requests. Please contact me at (865) 380-4802 or by e-mail at kwiggins@cityofalcoa-tn.gov should you have any questions or if you'd like to discuss any of these suggestions.

Sincerely,



Kenny Wiggins, PE
Engineering & Public Works Director

KDW/lis

Enclosure

cc (e-mail): Mr. Mark Johnson, CPA, Alcoa City Manager
Mr. Simon deVente, PE, Assistant Director / Chief Engineer
Mr. Shane Snoderly, PE, Civil Engineer
Mr. Mark Ross, Alcoa Construction Services Supervisor
Mr. Greg McClain, Maryville City Manager
Mr. Baron Swafford, Maryville Utilities Director
Mr. Doyle Prince, Treatment Plants Mgr, Maryville Water Quality Control
Mr. Woody Smith, TDEC-DWR Knoxville
Mr. John West, TDEC-DWR Knoxville
Mr. Vojin Janjic', TDEC-DWR Nashville
File: Wastewater Collection System Permit TDEC No. 88-073